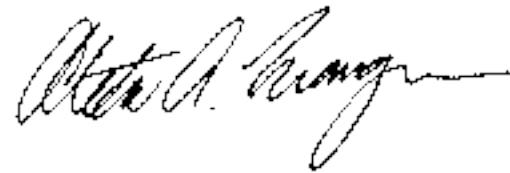


UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION



UNITED STATES OF AMERICA)
)
v.)
) No. 3:11-00237
OLEKSANDR VYSHNEVSKYY) Judge Trauger
)

MOTION TO CONTINUE TRIAL AND
ENLARGE PLEA DEADLINE

COMES NOW the Defendant, **Oleskandr Vyshnevskyy**, by and through his undersigned counsel, and hereby moves this Honorable Court for the entry of an Order (1) continuing the trial from July 10, 2012 to a date no earlier than late August 2012; and, (2) resetting the plea related deadlines consistent with the standard order of this Court. In support hereof, Defendant Vyshnevskyy states as follows:

1. This matter is currently set for trial on July 10, 2012. (Docket Entry 31). This is a first trial setting of this case.
2. Defendant Vyshnevskyy anticipates that, with additional time, this matter will be for plea rather than trial. However, a resolution of this case cannot be reached in the time remaining before the July 10, 2012 trial setting.
3. Currently, Defendant Vyshnevskyy and the government are exploring a potential resolution of this case. However, undersigned counsel is concerned about a disposition determinative aspect of the potential guideline calculation (safety valve) and is seeking input on the issue from the U.S. Probation office. Additionally, undersigned counsel is presently attempting to